

# **Exhibit E**



1 to your relationship with Wild Bill's besides the  
2 two e-mail accounts that you told me about?

3 A. Nowhere else that I can think of.

4 Q. Do you keep any paper files?

5 A. No. The only paper files I keep are for  
6 tax purposes.

7 Q. Do you have any text messages to or from  
8 Wild Bill's?

9 A. No, not anymore.

10 Q. What about voicemails?

11 A. No, they're all gone. I don't think I  
12 had any voicemails anyway from them.

13 Q. What makes you think that you have more  
14 payroll documents than what you provided?

15 A. What makes me think?

16 Q. Yes.

17 A. Because I did a search and I saw more.

18 Q. Sir, do you know that you have a duty to  
19 preserve potentially relevant documents like your  
20 pay information in this case?

21 A. I didn't, but I don't typically delete  
22 that stuff.

23 Q. Has anyone instructed you to preserve any  
24 potentially relevant information?

25 A. No.